

Hearing Date: July 13, 2022 at 10:00 a.m. (ET)

Response Deadline: April 26, 2022

Reply Deadline: May 26, 2022

Leo Muchnik

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff
Investment Securities LLC, and Bernard L.
Madoff,

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 12-01002 (CGM)

ORAL ARGUMENT REQUESTED

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| Plaintiff, v. THE PUBLIC INSTITUTION FOR SOCIAL SECURITY, Defendant. |
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**NOTICE OF DEFENDANT THE PUBLIC INSTITUTION
FOR SOCIAL SECURITY'S MOTION TO DISMISS COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Leo Muchnik and the exhibits thereto, Defendant The Public Institution for Social Security (“PIFSS”) shall move this Court, before the Honorable Cecelia G. Morris, United States Bankruptcy Judge, at the United States Bankruptcy Court, Southern District of New York, Alexander Hamilton Customs House, Courtroom 621, One Bowling Green, New York, New York, 10004-1408, on July 13, 2022 at 10:00 a.m., for an Order pursuant to Rules 12(b)(1), (b)(2), and (b)(6) of the Federal Rules of Civil Procedure, made applicable hereto and incorporated into the above-captioned adversary proceeding by Federal Rule of Bankruptcy Procedure 7012, dismissing with prejudice the Complaint and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Scheduling Order, dated February 7, 2022 [Dkt. 113], the Trustee’s response, if any, is due on or before April 26, 2022, and PIFSS’ reply, if any, is due on or before May 26, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, PIFSS does not consent to the entry of final orders or judgment by this Court.

Dated: February 25, 2022
New York, New York

GREENBERG TRAURIG, LLP

By: /s/ Leo Muchnik
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